UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

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: : :	PROMESA Title III Case No. 17-BK-3283 (LTS)
:	(Jointly Administered)
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INFORMATIVE MOTION OF THE COFINA SENIOR BONDHOLDERS' COALITION REGARDING ITS REQUEST TO BE HEARD AT THE APRIL 25-26, 2018 OMNIBUS HEARING

To the Honorable United States District Court Judge Laura Taylor Swain:

The COFINA Senior Bondholders' Coalition² submits this informative motion in response to the Court's *Order Relocating the April 25, 2018 Omnibus Hearing* (Dkt. 2886) (the "Order"), and respectfully states as follows:

The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

The members of the COFINA Senior Bondholders' Coalition are Fideicomiso Plaza, and the following entities, either as beneficial holders or on behalf of managed funds and accounts: Aristeia Horizons, L.P.; Decagon Holdings 1, L.L.C.; Decagon Holdings 2, L.L.C.; Decagon Holdings 3, L.L.C.; Decagon Holdings 4, L.L.C.; Decagon Holdings 5, L.L.C.; Decagon Holdings 6, L.L.C.; Decagon Holdings 7, L.L.C.; Decagon Holdings 8, L.L.C.; Decagon Holdings 9, L.L.C.; Decagon Holdings 10, L.L.C.; GoldenTree Asset Management LP; Old Bellows Partners LP; Scoggin Management LP; Taconic Master Fund 1.5 L.P.; Taconic Opportunity Master Fund L.P.; Tilden Park Capital Management LP; and Whitebox Advisors LLC.

- 1. Susheel Kirpalani, Daniel Salinas, and Eric Kay of Quinn Emanuel Urquhart & Sullivan, LLP, and Rafael Escalera of Reichard & Escalera, co-counsel for the COFINA Senior Bondholders' Coalition, will appear at the April 25 Hearing in Courtroom 17C of the United States District Court for the Southern District of New York. Mr. Kirpalani and Mr. Escalera intend to appear and present argument regarding the following Documents (as defined in the *Fourth Amended Notice, Case Management and Administrative Procedures*, (Dkt. 2839-1)) filed by the COFINA Senior Bondholders' Coalition:
 - Statement of the COFINA Senior Bondholders' Coalition in Support of, and Joinder to, the Motion to Certify (Adv. Proc. No. 17-257, Dkt. 332) (the "Joinder")
 - Reply Memorandum of Law of the COFINA Senior Bondholders' Coalition in Support of Motion to Certify Questions Under Puerto Rico Law to the Supreme Court of Puerto Rico (Adv. Proc. No. 17-257, Dkt. 453)
 - All other Documents filed by the COFINA Senior Bondholders' Coalition in support of its Joinder
- 2. The COFINA Senior Bondholders' Coalition reserves its right to be heard on any matter presented to the Court and to respond to any statements made or issued raised by the Court or any other party in connection with the above-captioned Title III cases to the extent it impacts COFINA or the interests of the COFINA Senior Bondholders' Coalition.
- 3. Mr. Salinas and Mr. Kay will attend the April 25 Hearing in person on behalf of the COFINA Senior Bondholders' Coalition in New York, and request to be seated at counsel's table with Mr. Kirpalani and Mr. Escalera, but will not seek to be heard.

DATED: April 20, 2018

Respectfully submitted, REICHARD & ESCALERA

By: <u>/s/ Rafael Escalera</u>

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CERTIFICATE OF SERVICE

I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel for the parties of record.

/s/ Carlos R. Rivera-Ortiz USDC-PR 303409